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November 3, 2021

VIA ECF

The Honorable Paul A. Engelmayer
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 1305
New York, NY 10007

Re: Black v. Ganieva, et al.; Civil Action No. 1:21-cv-08824 (PAE)

Dear Judge Engelmayer:

I am a Partner at Wigdor LLP (“Wigdor”) and write in connection with the above captioned matter in which our law firm was named as a Defendant, along with Guzel Ganieva,¹ in a complaint filed by Leon Black (“Black”). Black is represented by Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), along with Susan Estrich, of Estrich Goldin LLP.

Wigdor represents Ms. Ganieva in the pending action, Guzel Ganieva v. Leon Black, Index No. 155262/2021, in the New York Supreme Court, County of New York, before the Hon. David B. Cohen. That case was filed on June 1, 2021. The action before Your Honor was commenced Thursday evening, October 28, 2021. On November 2, 2021, Quinn Emanuel contacted Wigdor to ask if we would accept service of the Summons and Complaint on behalf of Wigdor and Ms. Ganieva. If we refused, Quinn Emanuel said it would proceed with personal service. Despite Wigdor responding before 5:00 p.m. yesterday that we would accept service for the firm and Ms. Ganieva, this morning at 8:30 a.m., Ms. Ganieva was served personally with the Summons and Complaint. Wigdor was served personally at 10:15 a.m. There is no explanation for this except that Black intended to harass and intimidate the Defendants.

In our email to Quinn Emanuel in which we stated that we would accept service, thereby obviating the need for personal service, we also asked for the professional courtesy of an extension to respond to the Complaint. They have not responded to our request. Specifically, we asked to respond to the Complaint on or before February 4, 2022. In addition to the upcoming holidays, this extension is

¹ Black is represented in the New York Supreme Court case by Perry Guha LLP and Quinn Emanuel.

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needed because the process of retaining counsel will undoubtedly take longer than usual as there are numerous issues concerning conflicts that need to be considered and cleared prior to any engagement.

First, Black is the former Chairman and Founder of Apollo Global Management, Inc. (“Apollo”). In addition to the extensive legal work performed in connection with Apollo directly, the private equity firm owns or is affiliated with hundreds of other companies for which many law firms perform legal work, encompassing multiple areas of practice. This fact will create conflicts with law firms that we would normally consider for this representation. Second, in connection with Wigdor’s plaintiff-side employment and sexual assault practice, we have represented thousands of individuals in actions against their employers or other individuals. In the majority of these cases, the employers and/or individuals are represented by top defense firms with national practices. As such, we must navigate the potential conflicts that will arise because of these current and/or former matters. Third, once we are able to secure counsel to represent the firm and Ms. Ganieva, counsel will need sufficient time to get up to speed on the matter and prepare a response to the complaint which will likely fall in the holiday period.

Accordingly, under these circumstances, we respectfully request that the Court extend the time for Wigdor and Ms. Ganieva to answer or otherwise respond to the Complaint until February 4, 2022. The current response date is November 24, 2021, and this is the first request for an extension.

We thank the Court for the time and attention to this request.

Respectfully submitted,



Jeanne M. Christensen